

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

BRUNICE PATTERSON,

Plaintiff,

v.

AUTO-OWNERS INSURANCE
COMPANY, a foreign corporation,
BILL REAVES, an individual,
and Fictitious Defendants A-Z,

Defendants.

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

CIVIL ACTION NO.:

2:07CV5916-1D

NOTICE OF CONSENT TO REMOVAL OF DEFENDANT
BILL REAVES

COMES NOW Defendant, Bill Reaves, a resident citizen of the State of Alabama, by and through the undersigned counsel, and although unnecessary based upon the fraudulent joinder of said Defendant, hereby files this notice of consent to removal expressly consenting to the removal of this action styled Brunice Patterson v. Auto-Owners Insurance Company, et al., Case No.: 07-900019.00, from the Circuit Court of Covington County, Alabama, to the United States District Court for the Middle District of Alabama, Northern Division, pursuant to 28 U.S.C. §§1332, 1441, and 1446. By filing this notice of consent to removal this Defendant reserves all rights and defenses of Defendant with respect to lack of personal jurisdiction and/or insufficiency of process and/or insufficiency of service of process and does not otherwise voluntarily submit to the jurisdiction of this court or of any other court without proper process and/or service of process.

Dated this the 27th day of June, 2007.

Respectfully submitted,



ROGER S. MORROW (MOR032)



JOEL H. PEARSON (PEA019)
ATTORNEYS FOR DEFENDANT
BILL REAVES

OF COUNSEL:

MORROW, ROMINE & PEARSON, P.C.
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Telephone: (334) 262-7707
Facsimile: (334) 262-7742

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing upon the following by placing a copy of same in the United States mail, first class postage prepaid on this the 27th day of June, 2007.

Hon. Thomas B. Albritton
Albrittons, Clifton, Alverson,
Moody & Bowden, P.C.
P.O. Box 880
Andalusia, AL 36420



OF COUNSEL